

# EXHIBIT A

Highly Confidential - Subject to Further Confidentiality Review

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

IN RE: NATIONAL : MDL NO. 2804  
PRESCRIPTION OPIATE :  
LITIGATION :

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: CASE NO.  
THIS DOCUMENT : 1:17-MD-2804  
RELATES TO ALL CASES:  
: Hon. Dan A.  
: Polster

- - -

Wednesday February 20, 2019

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HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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Videotaped deposition of PAUL  
ANDREW PYFER, taken pursuant to notice,  
was held at Golkow Litigation Services,  
One Liberty Place, 1650 Market Street,  
Suite 5150, Philadelphia, Pennsylvania  
19103, beginning at 9:35 a.m., on the  
above date, before Amanda Dee  
Maslynsky-Miller, a Certified Realtime  
Reporter.

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GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

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<p style="text-align: right;">Page 14</p> <p>1 Q. Okay. So generally</p> <p>2 speaking, were both of the prior two</p> <p>3 depositions regarding marketing</p> <p>4 practices?</p> <p>5 A. I believe so.</p> <p>6 Q. All right. Since you've</p> <p>7 given two prior depositions, you</p> <p>8 understand that today you're under oath,</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. You understand it's</p> <p>12 important to tell the truth today,</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. And you understand it's</p> <p>16 important to fully answer my questions</p> <p>17 truthfully?</p> <p>18 You understand that, right?</p> <p>19 A. Yes.</p> <p>20 Q. If I ask you a question</p> <p>21 today that you do not understand, will</p> <p>22 you please tell me so?</p> <p>23 A. Yes.</p> <p>24 Q. Thank you.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Did you hire him personally?</p> <p>2 A. I don't know how to answer</p> <p>3 that.</p> <p>4 Q. Are you paying him?</p> <p>5 A. No.</p> <p>6 Q. Okay. Who is paying your</p> <p>7 second counsel?</p> <p>8 A. Teva.</p> <p>9 Q. Without telling me any</p> <p>10 discussions you've had with either of</p> <p>11 your counsel, or any of your counsel, do</p> <p>12 you have an understanding as to the</p> <p>13 reason why you have personal counsel</p> <p>14 here?</p> <p>15 A. Yes.</p> <p>16 MR. ANDRISANI: Objection.</p> <p>17 BY MR. MADDEN:</p> <p>18 Q. What is your understanding?</p> <p>19 MR. ANDRISANI: Objection.</p> <p>20 THE WITNESS: To represent</p> <p>21 my interests.</p> <p>22 BY MR. MADDEN:</p> <p>23 Q. Did you ask for personal</p> <p>24 counsel?</p>
<p style="text-align: right;">Page 15</p> <p>1 What, if anything, did you</p> <p>2 do to prepare for your deposition today?</p> <p>3 A. Met with the lawyers.</p> <p>4 Q. Okay. Are you represented</p> <p>5 today by counsel?</p> <p>6 A. Yes.</p> <p>7 Q. What counsel represents you</p> <p>8 today?</p> <p>9 A. The two gentlemen to my</p> <p>10 left.</p> <p>11 Q. All right. I understand one</p> <p>12 counsel is the law firm of Morgan Lewis,</p> <p>13 which represents Teva now.</p> <p>14 Do you have that</p> <p>15 understanding?</p> <p>16 A. Yes.</p> <p>17 Q. You no longer work for Teva</p> <p>18 or Cephalon; is that true?</p> <p>19 A. That is correct.</p> <p>20 Q. And then there is second</p> <p>21 counsel here today.</p> <p>22 What understanding do you</p> <p>23 have as to that second counsel's role?</p> <p>24 A. He's representing me.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. I did.</p> <p>2 Q. And personal counsel was</p> <p>3 provided by Teva, correct?</p> <p>4 A. Correct.</p> <p>5 Q. All right. You indicated</p> <p>6 that you met with counsel.</p> <p>7 Did you meet with counsel</p> <p>8 yesterday?</p> <p>9 A. Yes.</p> <p>10 Q. Did you meet with counsel at</p> <p>11 any time other than yesterday?</p> <p>12 A. Yes.</p> <p>13 Q. On how many occasions did</p> <p>14 you meet with counsel?</p> <p>15 A. A total of three.</p> <p>16 Q. Approximately how much time</p> <p>17 in those three meetings did you spend</p> <p>18 with counsel, total?</p> <p>19 A. Probably 14, 15 hours.</p> <p>20 Q. Did you review documents to</p> <p>21 prepare for your deposition today?</p> <p>22 A. Yes.</p> <p>23 Q. And did you have the</p> <p>24 opportunity to review those documents in</p>